

REMARKS

In response to the Office Action dated November 14, 2007, Applicants respectfully request reconsideration based on the above amendments and the following remarks. Applicants respectfully submit that the claims as presented are in condition for allowance.

Claims 1-4 and 11 were rejected under 35 U.S.C. § 103 as being unpatentable over Goodman in view of Hylton. This rejection is traversed for the following reasons.

Claim 1 has been amended to include the media bus. Support for this element is found in at least Applicants' Figure 7, element 610 and the associated detailed description. Neither Goodman nor Hylton teaches or suggests the use of a system bus, network bus and media bus as recited in claim 1.

In applying Goodman, the Examiner cites to tuner 901/903 as corresponding to the claimed media server. As tuner 901/903 is located in NIM 201, the Examiner must consider the link between the NIM 201 and the DET 202 the claimed system bus as the claimed media server transmits the transport layer over the system bus. Given this interpretation, Goodman fails to teach a network bus and a media bus. Even if the output of the video port on the DET 202 is construed to be a bus, this output cannot correspond to both the network bus and the media bus. Thus, Goodman fails to teach the system bus, network bus and media bus of claim 1.

Further, Goodman fails to teach that tuner 901/903 tunes to a transport layer as defined in claim 1. The Examiner cites to column 14, lines 30-35 and column 15, lines 1-7 as allegedly teaching transmission of a transport layer. These sections discuss packets transmitted on the ATM backbone sub-network, but do not indicate how tuner 901/903 operates. The Examiner cannot use features from one portion of the network as being part of the tuner 901/903. The tuner 901 is described as selecting a specific 6 MHz channel from the input spectrum (column 91, lines 26-30). This is contrary to claim 1, which recites that the media server tunes to a transport layer. Goodman does not teach that the entire transport layer is transmitted across these components, but rather one channel.

Hylton was relied upon for disclosing a decryption module. Even if a decryption module was positioned in the DET 202 in Goodman, it would operate on a single channel, rather than a transport layer as recited in claim 1. Further, there is no motivation to add the decryption module of Hylton to the DET 202 of Goodman. Goodman already has a

decryption module in the NIM 201 as shown as element 907 in Figure 9. It is unclear why a decryption module would be needed in the DET 202 when it is already present in the NIM 201. Thus, there is insufficient motivation to combine Goodman and Hylton as proposed by the Examiner.

For at least the above reasons, claim 1 is patentable over Goodman in view of Hylton. Claims 2-4 and 11 variously depend from claim 1 and are patentable over Goodman in view of Hylton for at least the reasons advanced with reference to claim 1.

Claims 12, 14 and 15 were rejected under 35 U.S.C. § 103 as being unpatentable over Goodman in view of Hylton and Florin. This rejection is traversed for the following reasons.

Florin was relied upon for allegedly disclosing a system having a tuner and broadband input/output modules connected by a system bus. Florin, however, fails to cure the deficiencies of Goodman in view of Hylton discussed above with reference to claim 1. Claim 12 recites features similar to those discussed above with reference to claim 1 and is patentable over Goodman in view of Hylton and Florin for at least the reasons advanced with reference to claim 1. Claims 14 and 15 depend from claim 12 and are patentable over Goodman in view of Hylton and Florin for at least the reasons advanced with reference to claim 12.

Claims 5-9 were rejected under 35 U.S.C. § 103 as being unpatentable over Goodman in view of Hylton and Rajakarunanajake. This rejection is traversed for the following reasons.

Rajakarunanajake was relied upon for allegedly disclosing features of a secured network conditional access system, but fails to cure the deficiencies of Goodman in view of Hylton discussed above with reference to claim 1. Claim 5-9 depend from claim 1 and are patentable over Goodman in view of Hylton and Rajakarunanajake for at least the reasons advanced with reference to claim 1.

Claim 16 was rejected under 35 U.S.C. § 103 as being unpatentable over Goodman in view of Hylton and Florin and Rajakarunanajake. This rejection is traversed for the following reasons.

Rajakarunanajake was relied upon for allegedly disclosing an Ethernet transport layer, but fails to cure the deficiencies of Goodman in view of Hylton and Florin discussed above with reference to claim 12. Claim 16 depends from claim 1 and is patentable over

Goodman in view of Hylton and Florin and Rajakarunanajake for at least the reasons advanced with reference to claim 12.

Claim 10 was rejected under 35 U.S.C. § 103 as being unpatentable over Goodman in view of Hylton and D'Luna. This rejection is traversed for the following reasons.

D'Luna was relied upon for allegedly disclosing incorporating decrypting, demultiplexing and decoding functions on a single chip, but fails to cure the deficiencies of Goodman in view of Hylton discussed above with reference to claim 1. Claim 10 depends from claim 1 and is patentable over Goodman in view of Hylton and D'Luna for at least the reasons advanced with reference to claim 1.

Claim 13 was rejected under 35 U.S.C. § 103 as being unpatentable over Goodman in view of Hylton and Florin and Lorenz. This rejection is traversed for the following reasons.

Lorenz was relied upon for allegedly disclosing a decoder as part of a thin client set top box, but fails to cure the deficiencies of Goodman in view of Hylton and Florin discussed above with reference to claim 12. Claim 13 depends from claim 12 and is patentable over Goodman in view of Hylton and Florin and Lorenz for at least the reasons advanced with reference to claim 12.

In view of the foregoing remarks and amendments, Applicants submit that the above-identified application is now in condition for allowance. Early notification to this effect is respectfully requested.

If there are any charges with respect to this response or otherwise, please charge them to Deposit Account 06-1130.

Respectfully submitted,

By: 

David A. Fox
Registration No. 38,807
CANTOR COLBURN LLP
20 Church Street, 22nd Floor
Hartford, CT 06103-3207
Telephone (860) 286-2929
Facsimile (860) 286-0115
Customer No. 36192

Date: February 8, 2008